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James P. Rau (JR 7209)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
NECOSHIP ITALIA SPA,	:	
	:	07 Civ. 8857 (JGK)
Plaintiff,	:	
	:	ECF
	:	
-against-	:	
	:	<b>NOTICE OF MOTION</b>
	:	<b>FOR COUNTER-SECURITY</b>
	:	<b><u>ON COUNTERCLAIM</u></b>
COSMOTRADE EXPORTS SA,	:	
COSMOTRANS NAVIGATION SA and	:	
COSMOFREIGHT INC.,	:	
	:	
	:	
Defendants.	:	
-----X	:	

PLEASE TAKE NOTICE, that upon the annexed Affidavit of James P. Rau, sworn to on the 21st day of April, 2008, and upon all the papers filed herein, the undersigned will move this Court in Room 12B, before the Honorable John G. Koeltl, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York on the 13th day of May, 2008, at 10:00 a.m., or as soon thereafter as counsel can be heard, for an Order, pursuant to the provisions of Rule E(7) of the Supplemental Rules for Certain Admiralty and Maritime Claims,

directing Plaintiff to provide counter-security on Defendant's counterclaim and vacating the attachment of Defendants' funds if the Plaintiff does not provide such counter-security, and for such other, further and different relief as may be just in this matter.

Pursuant to Local Rule 6.1 of the Southern District of New York, answering papers are due ten (10) business days from service of this motion.

Dated: New York, New York  
April 21, 2008

CARDILLO & CORBETT  
Attorneys for Defendant  
COSMOTRADE EXPORTS SA

By: 

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TO: Lennon Murphy & Lennon  
Nancy R. Peterson, Esq.  
(Via ECF)